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Via ECF Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation by Polaris Wireless, Wireless E911 Location Accuracy Requirements PS Docket No. 07-114

Dear Secretary Dortch:

Pursuant to Section 1.1206 of the Federal Communication Commission's ("FCC") rules, the undersigned counsel hereby provides notice that, on June 28, 2019, Polaris Wireless Inc.'s Chief Executive Officer, Manlio Allegra and Executive Director of Business Development, Karl Kessenich, and Venable LLP attorneys Ian Volner and Meryl Nolan (collectively "Polaris Wireless") met with David Furth, John Evanoff, Kenneth Carlberg, Erika Olsen, Nellie Foosaner, Rasoul Safavian, along with their interns Jamie McCoy, Allison Venable, Natalie Seales, and Sean Saper in the Public Safety and Homeland Bureau. That same day, Polaris Wireless also met separately with Zenji Nakazawa of Chairman Pai's office.

During the meetings, Polaris Wireless explained the current capabilities of its software-based solution that delivers affordable and scalable 3-meter z-axis accuracy. Polaris Wireless currently offers its technology as an over-the-top offering for First Responders. With this technology, Polaris Wireless uses specific, publicly available, weather reference data, supplemented with selectively deployed, commercial weather stations. Doing so achieves necessary accuracy while minimizing cost and complexity. On the point of barometric sensor compensation, Polaris Wireless stated there are multiple options for implementation of necessary algorithms. Additionally, Polaris Wireless can deliver uncertainty values for its vertical axis location estimates, similar to how uncertainty is delivered today for horizontal location.

Polaris Wireless emphasized that, as evident the extensive record that the Commission has developed over the years, a 3-meter z-axis metric is desired, supported, and achievable within the current timelines, and is the prudent next step for serving public safety. Certainly, development

and testing of additional vendors and additional technologies will continue as devices, networks, and reference databases evolve. In fact, Polaris Wireless remains committed to innovating technology for improving indoor and vertical accuracy by advancing barometric-based algorithms and by introducing other location techniques to serve the needs of E911 callers as well as First Responders. But there is no need for further delay in establishing a benchmark for z-axis location accuracy. Doing so would only undermine the public safety objectives of the Commission. In response to a question, Polaris Wireless stated unequivocally that it would be amenable for carriers to demonstrate compliance through certification of its use of a technology verified in the Test Bed to achieve the z-axis metric.

For the reasons discussed in its Reply Comments and above, Polaris Wireless respectfully requests that the Commission move quickly to adopt a wireless vertical location requirement of +/-3 meters for 80% of wireless calls from z-axis capable handsets.

Respectfully submitted,

/s/ Ian D. Volner

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